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June 30, 2022

VIA ECF

The Honorable John G. Koeltl
United States Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

*Time to respond to the Complaint
extended to 8/1/22. Parties
should submit a Rule 26 (f) report
by August 12, 2022.
The conference scheduled for
7/7/22 is canceled.*

Re: *Picon v. Wilson & Son Ltd.*
Case No.: 1:22-cv-3082

Dear Judge Koeltl,

*So ordered.
6/30/22 J. G. Koeltl / U.S.D.*

The undersigned represents Yelitza Picon, on behalf of herself and all other persons similarly situated ("Plaintiff"), in the above-referenced action against Defendant, Wilson & Son Ltd., ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for July 7, 2022, at 3:30 PM be adjourned for 60 days because although we have been in contact with Counsel for the Defendant, they have not yet answered or appeared in this Action. Additionally, the undersigned respectfully requests Your Honor grant the Defendant an additional 30 days to respond to the Complaint until August 1, 2022, so that the Defendant has ample opportunity to appear and defend themselves in this Action. This request will grant ample time for the Defendant to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an extension

We thank the Court for its time and attention in this matter.

Respectfully submitted,

GOTTLIEB & ASSOCIATES

/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.